

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

MISTY BLANCHETTE PORTER, M.D.,

Plaintiff,

vs.

DARTMOUTH-HITCHCOCK MEDICAL
CENTER, DARTMOUTH-HITCHCOCK
CLINIC, MARY HITCHCOCK
MEMORIAL HOSPITAL, and
DARTMOUTH-HITCHCOCK HEALTH,

Defendants.

Case No. 2:17-cv-194

DEFENDANTS' MOTION TO QUASH DR. JOANNE CONROY'S TRIAL SUBPOENA

Defendants Dartmouth-Hitchcock Medical Center, Dartmouth-Hitchcock Clinic, Mary Hitchcock Memorial Hospital, and Dartmouth-Hitchcock Health (collectively, "Defendants" or "Dartmouth Health") hereby move, pursuant to Fed R. Civ. P. 45(d)(3)(A)(iv), Fed. R. Evid. 401 and. 403, as well as the Order issued by this Honorable Court on January 13, 2025, at ECF Docket No. 194, to quash Dr. Joanne Conroy's ("Dr. Conroy") trial subpoena (the "Motion"). The grounds for Defendants' Motion are fully set forth in the accompanying memorandum of law. In brief, Dr. Conroy has no first-hand knowledge of any fact of consequence in this litigation, her testimony has no probative value and thus risks wasting the jury's time, and it would be unfairly prejudicial and burdensome to require Dr. Conroy to testify.

Pursuant to Local Rule 7(a)(7), Defendants hereby certify that they have made a good faith attempt to obtain Plaintiff's agreement to the requested relief, and such agreement was not

obtained. Defendants hereby request an evidentiary hearing on this Motion pursuant to Local Rule 7(a)(6).

Date: February 14, 2025

Respectfully submitted,

/s/ Tristram J. Coffin

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CERTIFICATE OF SERVICE

I hereby certify that, on February 14, 2025, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Tristram J. Coffin

Tristram J. Coffin